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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

THERESE L. LESHER,) Case No. 2:21-cv-00386-WBS-DMC
Plaintiff,)
vs.)
CITY OF ANDERSON, et al.,) **STIPULATION AND ORDER EXTENDING**
Defendants.) **THE DATES FOR DISCOVERY CUTOFF AND**
) **DEADLINE TO FILE NON-DISCOVERY**
) **MOTIONS IN CURRENT SCHEDULING**
) **ORDER (ECF NO. 70)**
)
)

1 PURSUANT TO CIVIL LOCAL RULE 144 (Fed. R. Civ. P. 16(b)(1)(A)), THE
2 PARTIES HEREBY RESPECTFULLY STIPULATE, THROUGH THEIR ATTORNEYS OF
3 RECORD, AS FOLLOWS:

- 4 1. The parties have worked cooperatively together, in good faith, to accomplish the
5 necessary discovery and depositions.
- 6 2. Due to circumstances out of the control of the parties or counsel, the parties wish to
7 extend the deadlines for the cut off of discovery and non discovery motions by five
8 months, respectively, which would cause the corresponding pretrial and trial dates
9 to be extended out. For one, Plaintiff's counsel were not available for expert
10 depositions during the month of July (due to depositions in other cases and prior
11 obligations), thus requiring that the cutoff date be extended until December 16,
12 2024. Secondly, the parties' experts have limited availability. The difficultiy in
13 aligning the schedules of the parties' experts with counsels' schedules requires the
14 extension.
- 15 3. Based on the logistical challenges that necessitate this extension, the parties
16 respectfully stipulate and request that the following dates/deadlines be extended as
17 follows:

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Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact and Expert, including compliance with any Motion to Compel Order)	July 12, 2024	December 16, 2024
Deadline to file non-discovery Motions	July 12, 2024	November 1, 2024
Final PreTrial Conference	September 23, 2024	February 10, 2025
Trial	December 10, 2025	April 1, 2025

Respectfully Submitted,

Dated: September 3, 2024

**LAW OFFICE OF SANJAY S. SCHMIDT
-and-
LAW OFFICES OF PANOS LAGOS**

/s/ Panos Lagos

By: Panos Lagos
Attorneys for Plaintiff,
THERESE L. LESHER

Dated: September 3, 2024

ANGELO, KILDAY & KILDUFF, LLP

/s/ *Kevin J. Dehoff*

By: Kevin Dehoff
KEVIN J. DEHOFF
Attorneys for Defendants CITY OF ANDERSON,
SEAN MILLER, JEFFREY MILEY, and
KAMERON LEE

*Pursuant to Local Rule 131(e), counsel has authorized submission of this document on
counsel's behalf

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**Stip. and Order Extending the Dates for Discovery Cutoff and Deadline to File Non-Discovery Motions
*Lesher v. City of Anderson, et al.***

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ORDER

Pursuant to the parties' Stipulation and good cause appearing, the deadlines in this case are hereby modified by the Court as follows:

Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact and Expert Including compliance with any Motion to Compel Order)	July 12, 2024	December 16, 2024
Deadline to file non-discovery Motions	July 12, 2024	November 1, 2024
Final PreTrial Conference	September 23, 2024	February 10, 2025, 1:30 pm
Trial	December 10, 2025	April 1, 2025, 9:00 am

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: September 3, 2024

William B. Shubb
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE